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ROBERT POOLEY

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:21-cr-00111-WBS
Plaintiff,)
vs.) **MR. POOLEY'S EXHIBIT LIST**
ROBERT POOLEY,) Date: May 15, 2024
Defendant.) Time: 9:00 a.m.
) Judge: Hon. William B. Shubb

Mr. Robert Pooley, by and through undersigned counsel, respectfully submits the following exhibit list. Mr. Pooley respectfully requests to reserve the opportunity to amend this list as appropriate. The defense is using exhibit numbers instead of exhibit letters and beginning the range at a suitably large number to avoid any overlap with the government exhibits.

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EXH	DESCRIPTION	IDENTIFIED	ADMITTED
2000	Sigma Tandem System Owner's Manual, 03-08-2016		
2001	Sigma Tandem System Owner's Manual, 01-08-2017		
2002	Section VI, 9. Module: Aircraft Procedures, excerpt from the UPT "Tandem Examiner Guide Lines for the Certification of Tandem Instructors", 11th Edition, April 21, 2010		
2003	Reporter's transcript of Grand Jury testimony of Reggie Lee, on June 10, 2021		
2004	June 22, 2021 Press Release by the Dept. of Justice, Eastern District of California, <i>San Joaquin County Skydiver Arrested for Running Unauthorized Tandem Instructor Courses</i>		
2005	Online information about the United States Parachute Association (USPA), printed on April 30, 2024 from the website www.uspa.org/about-uspa/what-is-uspa		
2006	USPA Skydivers Information Manual 2016-2017		
2007	Joshua Hall Subpoena Return - Documents Set 1 and Set 2		
2008	MOA - Telephonic interview of Joshua Hall by Special Agent Brian DuBois, on February 23, 2017		
2009	Garmashov v. United States Parachute Assoc., Inc., USDC-SDNY, 1:21-cv-04917-JGK-OTW, document 63 - Order granting Motion to Enforce Settlement Agreement		
2010	USPA Instructional Rating Manual 2016-2017		
2011	USPA Statement on Tandem Skydiving Safety and Instructor Certification		
2012	USPA Policy on Certain Tandem Instructor Candidates and Rating Holders		
2013	Google Return Letter 1906057 dated August 17, 2018		
2014	Google Return Letter 57696981 dated April 12, 2024		
2015	Reporter's transcript of Grand Jury testimony of Peter Swann, on December 5, 2019		
2016	MOA - Interview of Peter Swann by Special Agents Brian DuBois and Reggie Lee, on June 27, 2017		
2017	MOA - Interview of Peter Swann by Special Agent Brian DuBois, on January 12, 2018		
2018	MOA - Telephone call with Peter Swann by Special Agent Kyung Keum, on November 19,		

1		2019		
2	2019	MOA - Interview of Peter Swann by Special Agent Kyung Keum, on November 26, 2019		
3	2020	MOA - Interview of Peter Swann by Special Agent Reggie Lee with AUSA Christopher Hales, on December 5, 2019		
4	2021	Transcript of Robert Pooley interview by Special Agents Brian DuBois and Paolo Hernandez, on January 30, 2018		
5	2022	Transcript of Robert Pooley interview by Special Agents Reggie Lee and Richard Ficarelli, on April 27, 2021		
6	2023	PayPal Account information of Robert Pooley obtained by Special Agent Reggie Lee on June 18, 2021		
7	2024	Garmashov v. United States Parachute Assoc., Inc., USDC-SDNY, 1:21-cv-04917-JGK-OTW, document 37 - Memo in Support of Motion to Enforce Settlement Agreement		
8	2025	Email from Robert Pooley to Carlos Martinez Medel on August 9, 2016 forwarding email from JC Coldren with Subject: Tandem Examiner Inquiry		
9	2026	Documents seized from Yuri Garmashov's locker at the Parachute Center during Search Warrant execution on January 30, 2018		
10	2027	Blank USPA Tandem Instructor Rating Application forms with Yuri Garmashov's signatures, seized from Yuri Garmashov's locker at the Parachute Center during Search Warrant execution		
11	2028	Photos of a desk with computers taken during the execution of a search warrant at the Parachute Center in Lodi, on January 30, 2018		
12	2029	Emails in April 2021 between Special Agent Reggie Lee and Tom Noonan regarding UPT receipt of paperwork for Lachlan Morgan Mackay		
13	2030	Email from Special Agent Reggie to Tom Noonan on April 29, 2021 regarding Lachlan Morgan Mackay and communication from parachutecentervideodesk@gmail.com		
14	2031	May 14, 2021 Emails - USPA unable to find certain archived emails of Jim Crouch and Susan Sullivan		
15	2032	Emails in May 2021 between Special Agent Reggie Lee and Ron Bell of USPA regarding emails from parachutecentervideodesk@gmail.com		
16	2033	Notes of Special Agent Reggie Lee from interview of Danny Overeem on June 1, 2021		

1	2034	USPA Tandem Instructor Rating Application of Danny Overeem		
2	2035	UPT/USPA tandem instructor training paperwork of Brad North		
3	2036	Emails between Special Agent Reggie Lee and Brad North from March 23, 2021 to March 31, 2021		
4	2037	MOA - Interview of Brad North by Special Agents Reggie Lee and Richard Ficarelli, on March 29, 2021		
5	2038	MOA - Interview of Brad North by Special Agents Reggie Lee and Richard Ficarelli, with AUSAs Kate Lydon and Dhruv Sharma, on February 5, 2024		
6	2039	Text messages between Brad North and Special Agent Reggie Lee		
7	2040	MOA - Document receipt of Brad North's tandem instructor training paperwork by Special Agent Reggie Lee		
8	2041	Special Agents' notes from interviews of Brad North		
9	2042	Emails on August 20-21, 2015 between Robert Pooley and Yuri Garmashov with Subject: Tandem candidates		
10	2043	Tandem instructor certification paperwork of Jason Spurgeon		
11	2044	Emails from August 2015 with Subject: New TI paperwork package for Jason Spurgeon		
12	2045	Emails from August 2015 with Subject: New TI paperwork package for Jason Spurgeon		
13	2046	Emails from August 2015 with Subject: New TI paperwork package for Jason Spurgeon		
14	2047	Email from Yuri Garmashov to yurig@89vx.net with Subject: Screenshot (September 30, 2016 2:24 PM)		
15	2048	Emails on April 22, 2021 between Special Agent Reggie Lee and Gonzalo Fabricio Palomino Benitez with attached screenshots of Facebook messages		
16	2049	MOA - Telephonic interview of Gonzalo Fabricio Palomino Benitez by Special Agent Reggie Lee, on April 22, 2021		
17	2050	Emails between Special Agent Reggie Lee and Gonzalo Fabricio Palomino Benitez from April 22, 2021 to June 23, 2021		
18	2051	Screenshots of Facebook messages between Gonzalo Fabricio Palomino Benitez and Sergii Osadchy		
19	2052	MOA - Special Agent Reggie Lee telephone call with Gonzalo Fabricio Palomino Benitez on May 21, 2021		

1	2053	MOA - Telephonic interview of Gonzalo Fabricio Palomino Benitez by Special Agent Reggie Lee, on May 28, 2021		
2	2054	MOA - Interview of Gonzalo Fabricio Palomino Benitez by Special Agents Reggie Lee and Richard Ficarelli, on February 7, 2024		
3	2055	Agent notes from interview of Gonzalo Fabricio Palomino Benitez on February 7, 2024		
4	2056	Notes of Special Agent Reggie Lee from interview of Gonzalo Fabricio Palomino Benitez on April 22, 2021		
5	2057	Garmashov v. United States Parachute Assoc., Inc., USDC-SDNY, 1:21-cv-04917-JGK-OTW, document 3 - Complaint		
6	2058	Cover photo from the July 2013 issue of Parachutist - photo of Yuri Garmashov		
7	2059	Text messages from and to 949-412-5339 and from July 8 through August 30, 2016		
8	2060	Text messages from and to 916-595-6172 on August 7-8, 2016		
9	2061	Email from Yuri Garmashov to Tom Noonan on August 10, 2016		
10	2062	Emails on August 12, 2016 between David Jensen and Yuri Garmashov		
11	2063	Emails from August 12-17, 2016 between David Jensen and Yuri Garmashov		
12	2064	Letter dated August 29, 2016 from Jason Putnam Gordon to Yuri Garmashov regarding USPA Administrative Suspension of Instructor Examiner Ratings Pending Further Investigation		
13	2065	Letter dated August 29, 2016 from Tom Noonan to Yuri Garmashov regarding Suspension of UPT Tandem Examiner Rating Pending USPA Reinstatement		
14	2066	Email from Kevin Stone to Yuri Garmashov on September 5, 2016 in reply to Garmashov's email on September 1, 2016 with Subject: USPA statement		
15	2067	Email from Evan Beecher to Yuri Garmashov on September 5, 2016 - Potential draft letter		
16	2068	Reply email from Yuri Garmashov to Evan Beecher on September 6, 2016 - Potential draft letter		
17	2069	Reply email from Evan Beecher to Yuri Garmashov on September 6, 2016 - Potential draft letter		
18	2070	Email from Yuri Garmashov to Robert Pooley on September 7, 2016 with attached letter		

1	2071	Email from Yuri Garmashov to Robert Pooley on September 8, 2016, Subject: letter		
2	2072	Email from Yuri Garmashov to Joshua Hall on September 8, 2016, with attached undated letter signed by Robert Pooley		
3	2073	Yuri Garmashov statement of events in 2016 in relation to his USPA suspension		
4	2074	Letter dated October 13, 2016, from Jan Meyer (USPA) notifying Yuri Garmashov that his USPA membership and all ratings have been revoked		
5	2075	Email from Tom Noonan to Yuri Garmashov on October 17, 2016 regarding attached UPT rating revocation letter		
6	2076	Yuri Garmashov statement of events in 2016 in relation to his USPA suspension		
7	2077	Michael Wadkins letter to USPA, dated February 6, 2017		
8	2078	Lachlan Mackay tandem instructor certification paperwork from retraining with Michael Wadkins		
9	2079	Video of Yuri Garmashov deposition on Feb. 11, 2020		
10	2080	Transcript of Yuri Garmashov deposition on Feb. 11, 2020		
11	2081	Emails on June 8, 2021 between Special Agent Reggie Lee and Fabian Munoz		
12	2082	MOA - Interview of Fabian Munoz by Special Agent Reggie Lee, on June 9, 2021		
13	2083	MOA - Interview of Fabian Munoz on January 31, 2024 by Special Agents Reggie Lee and Richard Ficarelli, with Special Agent Christina Jones providing Spanish translation		
14	2084	Agent notes from interview of Fabian Munoz on January 31, 2024		
15	2085	Fabian Munoz tandem instructor certification paperwork from retraining with Timoteo Salgado		
16	2086	MOA - telephonic interview of Willard "Jay" Stokes by Special Agent Brian DuBois, on December 27, 2017		
17	2087	MOA - telephonic interview of Willard "Jay" Stokes by Special Agent Reggie Lee, on May 27, 2021		
18	2088	MOA - interview of Willard "Jay" Stokes by Special Agents Reggie Lee and Richard Ficarelli, on February 6, 2024		

1	2089	Notes of Special Agent Reggie Lee from interview of Willard "Jay" Stokes on May 27, 2021		
2	2090	Agent notes from interview of Willard "Jay" Stokes on February 6, 2024		
3	2091	MOA - Interview of Mark Procos by Special Agents Reggie Lee and Richard Ficarelli, on January 31, 2024		
4	2092	Agent notes from interview of Mark Procos on January 31, 2024		
5	2093	MOA - Interview of Lachlan Morgan Mackay by Special Agents Reggie Lee and Richard Ficarelli, on January 23, 2024		
6	2094	Special Agent notes from interview of Lachlan Morgan Mackay on January 23, 2024		
7	2095	FAA Enforcement Investigation Report (EIR) of Robert Pooley		
8	2096	MOA - Interview of FAA Inspectors David Jensen and Matt DeSeelhorst by Special Agents Brian DuBois and Kathryn Kerkhoff, on January 4, 2017		
9	2097	MOA - David Jensen contacted Special Agent Brian DuBois on June 27, 2017		
10	2098	MOA - David Jensen contacted Special Agent Brian DuBois via email, on December 15, 2017		
11	2099	MOA - Special Agent Kyung Keum met and received documents from David Jensen, on December 20, 2019		
12	2100	MOA - Special Agent Kyung Keum received documents from David Jensen, on January 23, 2020		
13	2101	Record of Conversation (notes) on September 1, 2016 with Yuri Garmashov by David Jensen		
14	2102	Record of Visit - David Jensen contact with Yuri Garmashov at the Parachute Center, on September 1, 2016		
15	2103	MOA - Interview of Yuri Garmashov by Special Agent Kyung Keum, on March 5, 2020		
16	2104	Transcript of Yuri Garmashov interview by Special Agents Reggie Lee and Richard Ficarelli, on April 29, 2021		
17	2105	Audio file of recording of Yuri Garmashov interview by Special Agents Reggie Lee and Richard Ficarelli, on April 29, 2021		
18	2106	MOA - Interview of Yuri Garmashov by Special Agents Reggie Lee and Richard Ficarelli, on April 29, 2021		
19	2107	July 8, 2021 Dept. of Justice Proffer Agreement with Yuri Garmashov		

1	2108	MOA - Interview of Yuri Garmashov by Special Agents Reggie Lee, on July 12, 2021		
2	2109	Notes of Special Agent Reggie Lee from Proffer interview of Yuri Garmashov, on July 12, 2021		

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5 Respectfully submitted,

6 HEATHER E. WILLIAMS
7 Federal Defender

8 Date: May 6, 2024

9 /s/ Mia Crager
10 MIA CRAGER
MEGHAN McLOUGHLIN
Assistant Federal Defender
Attorney for Defendant
ROBERT POOLEY